PHILIP I. PERSON (SBN 281496)
TAYANAH C. MILLER (SBN 299123)
KHUSHPREET K. CHOUMWER (SBN 355576)
GREENBERG TRAURIG, LLP
101 Second Street, Suite 2200
San Francisco, California 94105-3668
Telephone: 415.655.1300
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Email: khushpreet.choumwer@gtlaw.com

Attorneys for Defendant
INTUIT INC.

THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

JOHN YOON, an individual;

Plaintiff,

vs.

INTUIT, INC., a California corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.:

DECLARATION OF PHILIP I. PERSON IN SUPPORT OF DEFENDANT'S NOTICE OF REMOVAL OF CIVIL ACTION

[Filed concurrently with Notice of Removal of Civil Action by Defendant Intuit Inc. to U.S. District Court and Declaration of Scott Zienty in Support of Defendant's Notice of Removal.]

[Removed from the Superior Court of the State of California for the County of Santa Clara, Case No. 24CV446657.]

State Complaint Filed: September 4, 2024

I, Philip I. Person, declare:

1. I am an attorney at Greenberg Traurig, LLP, counsel of record for Defendant Intuit Inc. ("Defendant") in the above-entitled matter, and I am duly licensed to practice law in the State of California. I make this declaration in support of Intuit's Notice of Removal. I have personal knowledge of the facts stated herein or know of such facts from my review of the case documents and the court docket in this matter and other information that is publicly available and, if called upon, I could and would testify competently to their truth.

2. On September 4, 2024, Plaintiff John Yoon ("Plaintiff") filed a Complaint in *John Yoon v. Intuit, Inc.; and DOES 1-10*, Superior Court of California, County of Santa Clara, Case No. 24CV446657 (the "State Court Action").

3. On March 24, 2025, I received and reviewed copies of Plaintiff served the Summons, Complaint, Notice of Case Management Conference, the Alternative Dispute Resolution Information packet, and the Notice of Service of Process (the "Pleadings"). The Pleadings reflect that Plaintiff served the Pleadings on Defendant via its designated agent, CSC Global.

4. On March 24, 2025, I accessed the publicly available LinkedIn profile for John Y. (the "LinkedIn Profile"). According to the LinkedIn Profile, John Y. is a former Intuit Senior Machine Learning Engineer who ended his employment in January 2024 and has been in Texas since February 2024.

5. On that same date, March 24, 2025, I saved a PDF copy of the LinkedIn Profile to my computer. Attached hereto as **Exhibit A** is a true and correct copy of the PDF of the LinkedIn Profile I saved on March 24, 2025.

6. Attached hereto as **Exhibit B** are true and correct copies of the Complaint, Summons, Notice of Hearing Case Management Conference, Civil Case Cover Sheet, and Defendant's Case Management Conference Statement.

I declare under the penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed this 18 day of April, 2025.

Philip I. Person

EXHIBIT A

Contact

www.linkedin.com/in/johnyoonh (LinkedIn)
github.com/johnyoonh/ (Personal)

Top Skills

Project Management
Stream Processing
Apache Spark

Languages

English (Native or Bilingual)
Korean (Native or Bilingual)

Certifications

Nutanix Platform Professional

Honors-Awards

AI Innovation Award
AI Innovation Award

Patents

MATCH SCORE IN MATCHMAKING MODELS

Two-Score System Matchmaking Models

John Y.

Sr Lead MLE at Capital One
Dallas-Fort Worth Metroplex

Summary

I am an experienced Data Science & Big Data innovator with a sound technical foundation. I understand business and its agile nature to solve business problems through cross-functional collaborations and partnerships.

I have successfully delivered large volumes of analytical, business intelligence, and search solutions to enable data-driven business success within challenging timelines.

In my roles, I have succeeded in varied roles as an engineer, product manager, technical program manager, and engineering manager in several business domains such as Storage, Cloud Computing, Education, Content Management, Media, Entertainment, Video, e-Sports, and Financial Technologies.

I am a team player with problem-solving and troubleshooting capabilities. I am also able to influence the team and function effectively on an independent basis or in a team capacity while motivating others toward the successful completion of projects.

Experience

Capital One
Senior Lead Machine Learning Engineer
February 2024 - Present (1 year 2 months)
Plano, Texas, United States

- Generative AI Platform. Architect and Expert on Guardrails and Retrieval-Augmented Generation
- Minimizing Hallucination and Malicious Attacks with Self-check, Groundedness, and Small Language Models

Intuit
Senior Machine Learning Engineer
December 2020 - January 2024 (3 years 2 months)

Mountain View, California, United States

- implemented the orchestration service for the GenAI initiative, launching the first service for Intuit Assist for both production and internal playgrounds with a moderation layer
- Productionalized TurboTax Live Matchmaking Models: Full Service, Business Tax, Under Penetrated Segment
- Productionalized Quickbooks Live Matchmaking Models: Front-Office, Back-Office, Payroll, Complexity Prediction
- Contributor of AI Lens Model Monitoring, Databricks adoption, SageMaker Studio solutions, Feature Management Platform, Apache Druid, Clean Data Initiative, Data Lake Access Management, Reusable AI, Virtual Expert Platform, Unified Feature Set, California Consumer Privacy Act Compliance, and Global Optimization

Tildawatch, Inc.
Chief Executive Officer
April 2017 - November 2020 (3 years 8 months)
Palo Alto, CA

Instagram for eSports highlights generated with algorithms. We detect highlights by analyzing sound to prune candidates for detailed analysis with machine learning. We provide a patented video player to switch between highlights and full video with a single click of a button. Jump to the most exciting part of the video when you use our web, iOS, and Android apps! We are working on an auto Table-of-Contents generator and video editor for content creators!

Stanford University Graduate School of Business
Mentor
January 2018 - March 2018 (3 months)
Stanford, California, United States

Mentored six graduate students for MS&E 274, Dynamic Entrepreneurship Strategies course, to devise a business plan and strategy for building an ecosystem for Tildawatch.
https://stanfordmse274.weebly.com/course-description.html

Wikicourse
Chief Executive Officer
April 2016 - April 2017 (1 year 1 month)
San Jose, California

Crowd-sourced lecture slides delivered via text-to-speech and deep learning

- Built Markdown-based Wiki in Django with a forking feature and quick conflict resolution.
- Designed and developed AI-based text parser and text-to-speech engine w/ < 100ms latency.
- Provided over 300 open-source courses in STEM subjects with Discourse forum.
- Launched a Github-based marketplace for interactive Javascript modules.

Nutanix
Member of Technical Staff
September 2013 - March 2016 (2 years 7 months)
San Jose, California

- Automate deployment, management, and optimization (utilization) of the clusters.
- Maintain, improve, and design features for the internal testing framework.
- Develop a pre-check-in testing framework to improve the code quality in the repository.
- Automate various types of upgrade tests on different combinations of hypervisors and the product.
- Troubleshoot and generate reports on automated tests.

Education

University of California, Los Angeles
Bachelor of Science - BS, Computer Science

Ann Sobrato High School

EXHIBIT B

E-FILED
9/4/2024 9:03 PM
Clerk of Court
Superior Court of CA,
County of Santa Clara
24CV446657
Reviewed By: M. Bui

DANA B. BARBEAU (SBN 253641)
323 Pershing Drive
Playa Del Rey, California 90293
Telephone: (310) 428-6018
Email: danabarbeau@gmail.com

Attorney for Plaintiff
JOHN YOON

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA – DOWNTOWN SUPERIOR COURT

JOHN YOON, an individual,

Plaintiff,

v.

INTUIT, INC., a California corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No: 24CV446657
Assigned for all purposes to:

COMPLAINT FOR:

1. **DISABILITY DISCRIMINATION;**
2. **FAILURE TO ACCOMMODATE;**
3. **RETALIATION FOR TAKING FMLA LEAVE; AND**
4. **WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY**

Action filed on: September 4, 2024

COMPLAINT FOR DAMAGES

Plaintiff John Yoon ("Plaintiff") hereby alleges the following against Defendants Intuit, Inc. ("Defendant") and DOES 1-10:

I.PARTIES

1. Plaintiff John Yoon is an individual residing in the County of Santa Clara, California.

2. Defendant Intuit, Inc. is a corporation duly organized and existing under the laws of the State of California, with its principal place of business in Mountain View, Santa Clara County, California.

3. Plaintiff is unaware of the true names and capacities of Defendants sued herein as DOES 1 through 10, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiff will amend this Complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes, and thereon alleges, that each of the fictitiously named Defendants is responsible in some manner for the occurrences herein alleged, and that Plaintiff's damages as herein alleged were proximately caused by such Defendants.

II. JURISDICTION AND VENUE

4. This Court has jurisdiction over this action pursuant to California Code of Civil Procedure Section 410.10, as Defendant conducts substantial business in Santa Clara County where the alleged wrongful termination occurred, and the amount in controversy exceeds the Court's jurisdictional minimum.

5. Venue is proper in this Court under California Code of Civil Procedure § 395(a) because the wrongful acts alleged herein occurred in the County of Santa Clara, California, where Defendant's principal place of business is located, and where Plaintiff was employed by Defendant.

III. FACTUAL ALLEGATIONS

6. Plaintiff was employed by Defendant Intuit, Inc. ("Defendant") as a Senior Machine Learning Engineer from December 2020 until his termination in January 2024.

7. During his employment, Plaintiff was diagnosed with depression and anxiety, which are qualifying disabilities under both the California Fair Employment and Housing Act (FEHA), Gov. Code § 12940 et seq., and the Americans with Disabilities Act (ADA), 42 U.S.C. § 12101 et seq. Defendant was aware of Plaintiff's disabilities.

8. Plaintiff was a remote employee throughout his employment until in or about October 2023, when Defendant informed him that his role would require in-office attendance at Defendant's Mountain View office several days per week. This was a substantial change in the terms and conditions of his employment.

9. Plaintiff requested reasonable accommodations for his disabilities, including the continuation of his remote work status. These requests were denied by Defendant in violation of the ADA, 42 U.S.C. § 12112(b)(5)(A), and FEHA, Gov. Code § 12940(m).

10. Plaintiff took a protected leave of absence under the Family and Medical Leave Act (FMLA), 29 U.S.C. § 2601 et seq., from May to September 2023. Upon his return, Defendant failed to reinstate him to his original remote position and instead imposed new in-office requirements.

11. Defendant terminated Plaintiff's employment in January 2024 shortly after his repeated requests for accommodation and his return from FMLA leave, in retaliation in violation of FMLA, 29 U.S.C. § 2615, and FEHA, Gov. Code § 12940(h).

12. Plaintiff has exhausted his administrative remedies by timely filing a complaint with the California Department of Fair Employment and Housing (DFEH) and the U.S. Equal Employment Opportunity Commission (EEOC) and received a Notice of Right to Sue from both agencies on June 7, 2024.

IV. FIRST CAUSE OF ACTION

(Disability Discrimination (FEHA, Gov. Code § 12940 et seq.; ADA, 42 U.S.C. § 12112 et seq.)

13. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

14. Defendant unlawfully discriminated against Plaintiff on the basis of his disabilities by changing the terms and conditions of his employment and ultimately terminating him

due to his disabilities and requests for reasonable accommodations, in violation of FEHA, Gov. Code § 12940 et seq., and ADA, 42 U.S.C. § 12112 et seq.

15. As a result of Defendant's actions, Plaintiff has suffered economic loss, emotional distress, and other damages in an amount to be proven at trial.

V. SECOND CAUSE OF ACTION

(Failure to Accommodate (ADA, 42 U.S.C. § 12112(b)(5)(A); FEHA, Gov. Code § 12940(m))

16. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

17. Defendant failed to provide reasonable accommodations for Plaintiff's known disabilities, in violation of the ADA, 42 U.S.C. § 12112(b)(5)(A) and FEHA, Gov. Code § 12940(m). Plaintiff was qualified to perform the essential functions of his job with reasonable accommodation.

18. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered and continues to suffer substantial losses and damages.

V. THIRD CAUSE OF ACTION

(Retaliation for Taking FMLA Leave (FMLA, 29 U.S.C. § 2615 et seq.; FEHA, Gov. Code § 12940(h))

19. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

20. Defendant retaliated against Plaintiff for exercising his rights under the FMLA by terminating his employment shortly after his return from FMLA leave and his requests for reasonable accommodation, in violation of FMLA, 29 U.S.C. § 2615, and FEHA, Gov. Code § 12940(h).

21. As a result of Defendant's conduct, Plaintiff has suffered lost wages, emotional distress, and other damages in an amount to be proven at trial.

///

///

///

VI. FOURTH CAUSE OF ACTION

(Wrongful Termination in Violation of Public Policy)

22. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

23. At all relevant times, California has maintained a fundamental public policy of protecting employees from discrimination, retaliation, and wrongful termination, as expressed in the California Fair Employment and Housing Act (FEHA), the Family and Medical Leave Act (FMLA), and the Americans with Disabilities Act (ADA), among other statutes and regulations.

24. Defendant's termination of Plaintiff's employment was in direct contravention of the public policies embodied in these laws, which prohibit discrimination based on disability, failure to accommodate, and retaliation for taking protected leave.

25. Plaintiff's termination was substantially motivated by his requests for reasonable accommodation due to his disability, his exercise of rights under the FMLA, and his opposition to Defendant's unlawful employment practices, which constitutes wrongful termination in violation of public policy.

26. As a direct and proximate result of Defendant's wrongful termination of Plaintiff in violation of public policy, Plaintiff has suffered and continues to suffer substantial losses, including but not limited to, loss of earnings, benefits, and future employment opportunities, as well as emotional distress, in an amount to be proven at trial.

27. Defendant's actions were committed maliciously, fraudulently, and oppressively, with the wrongful intention of injuring Plaintiff, from an improper motive amounting to malice, and in conscious disregard of Plaintiff's rights. Accordingly, Plaintiff is entitled to recover punitive damages from Defendant in an amount according to proof.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. For compensatory damages, including but not limited to, lost wages, benefits, and other economic losses, according to proof;

2. For general damages for emotional distress, pain, and suffering;

3. For punitive and exemplary damages as permitted by law;

4. For reasonable attorneys' fees and costs of suit incurred herein;

5. For pre-judgment and post-judgment interest as allowed by law;

6. For reinstatement to his former position or front pay in lieu thereof; and

7. For such other and further relief as the Court may deem just and proper.

VIII. DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial on all issues so triable.

Dated: September 4, 2024

/s/ Dana Barbeau

Dana Barbeau, SBN #253641
323 Pershing Drive
Playa Del Rey, CA 90293
(310) 428-6018
Attorney for Plaintiff John Yoon

SUM-100

SUMMONS
(CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

E-FILED
9/4/2024 9:03 PM
Clerk of Court
Superior Court of CA,
County of Santa Clara
24CV446657
Reviewed By: M. Bui
Envelope: 16504596

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):
Intuit, Inc., a California corporation; and DOES 1-10, inclusive

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):
John Yoon, an individual

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (*www.courtinfo.ca.gov/selfhelp*), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (*www.lawhelpcalifornia.org*), the California Courts Online Self-Help Center (*www.courtinfo.ca.gov/selfhelp*), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of $10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.
¡AVISO! *Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.*

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de $10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Santa Clara Superior Court, Downtown

191 North First Street, San Jose, CA 95113

CASE NUMBER:
(Número del Caso): 24CV446657

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Dana Barbeau, 323 Pershing Drive, Playa Del Rey, CA 90293, 310-428-6018

DATE: *(Fecha)* 9/4/2024 9:03 PM Clerk of Court Clerk, by *(Secretario)* M. Bui , Deputy *(Adjunto)*

(For proof of service of this summons, use Proof of Service of Summons *(form POS-010).)*
(Para prueba de entrega de esta citatión use el formulario Proof of Service of Summons, *(POS-010)).*

[SEAL]

NOTICE TO THE PERSON SERVED: You are served
1. [ ] as an individual defendant.
2. [ ] as the person sued under the fictitious name of *(specify):*
3. [x] on behalf of *(specify):* Intuit, Inc.
   under: [x] CCP 416.10 (corporation)
   [ ] CCP 416.20 (defunct corporation)
   [ ] CCP 416.40 (association or partnership)
   [ ] other *(specify):*
   [ ] CCP 416.60 (minor)
   [ ] CCP 416.70 (conservatee)
   [ ] CCP 416.90 (authorized person)
4. [ ] by personal delivery on *(date)*:

Form Adopted for Mandatory Use
Judicial Council of California
SUM-100 [Rev. July 1, 2009]

SUMMONS

Code of Civil Procedure §§ 412.20, 465
www.courts.ca.gov

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA
DOWNTOWN COURTHOUSE
191 NORTH FIRST STREET
SAN JOSÉ, CALIFORNIA 95113

Andrew S. Doriott
Southern California Labor Law Group PC
1875 Century Park East
Ste 480
LOS ANGELES CA 90067

RE: John Yoon vs Intuit, Inc.
Case Number: 24CV446657

NOTICE OF REASSIGNMENT OF CASE AND RESET HEARING

Please be advised that the above-captioned case has been reassigned to the Honorable Judge, Amber Rosen for Case Management in Department 16 effective 01/21/2025.

You are hereby notified that your upcoming hearing date has been reset as follows:

Date:	**04/11/2025**
Time:	**10:01 AM**
Department:	**Department 16**
Hearing Type:	**Conference: Case Management**

Please note that all future court dates will be heard in the department noted above. For further information, please visit https://portal.scscourt.org or call the Calendar Office at (408) 882-2410.

If you, a party represented by you, or a witness to be called on behalf of that party need an accommodation under the American with Disabilities Act, please contact the Court Administrator's office at (408) 882-2700, or use the Court's TDD line, (408) 882-2690 or the voice TDD California Relay Service, (800) 735-2922.

DECLARATION OF SERVICE BY MAIL: I declare under penalty that I served this notice by enclosing a true copy in a sealed envelope, addressed to each person whose name is shown below, and by depositing the envelope with postage fully prepaid, in the United States Mail at San Jose, CA on 01/09/2025 Clerk of the Court, by Bricia Roman-Antunez Deputy.

CC:

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY *(Name, State Bar number, and address):*
Dana Barbeau, SBN # 253641
323 Pershing Drive, Playa Del Rey, CA 90293
TELEPHONE NO.: 310-428-6018 FAX NO. :
EMAIL ADDRESS: danabarbeau@gmail.com
ATTORNEY FOR *(Name):* John Yoon

FOR COURT USE ONLY

Electronically Filed by Superior Court of CA, County of Santa Clara, on 9/4/2024 9:03 PM Reviewed By: M. Bui Case #24CV446657 Envelope: 16504596

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
STREET ADDRESS: 191 North First Street
MAILING ADDRESS: 191 North First Street
CITY AND ZIP CODE: San Jose, CA 95113
BRANCH NAME: Downtown Superior Court

CASE NAME:
John Yoon v. Intuit and DOES 1-10

CIVIL CASE COVER SHEET

[x] **Unlimited** (Amount demanded exceeds $35,000)
[ ] **Limited** (Amount demanded is $35,000 or less)

Complex Case Designation

[ ] Counter [ ] Joinder

Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER: 24CV446657

JUDGE:
DEPT.:

Items 1–6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:

Auto Tort
[ ] Auto (22)
[ ] Uninsured motorist (46)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort
[ ] Asbestos (04)
[ ] Product liability (24)
[ ] Medical malpractice (45)
[ ] Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort
[ ] Business tort/unfair business practice (07)
[ ] Civil rights (08)
[ ] Defamation (13)
[ ] Fraud (16)
[ ] Intellectual property (19)
[ ] Professional negligence (25)
[ ] Other non-PI/PD/WD tort (35)

Employment
[x] Wrongful termination (36)
[ ] Other employment (15)

Contract
[ ] Breach of contract/warranty (06)
[ ] Rule 3.740 collections (09)
[ ] Other collections (09)
[ ] Insurance coverage (18)
[ ] Other contract (37)

Real Property
[ ] Eminent domain/Inverse condemnation (14)
[ ] Wrongful eviction (33)
[ ] Other real property (26)

Unlawful Detainer
[ ] Commercial (31)
[ ] Residential (32)
[ ] Drugs (38)

Judicial Review
[ ] Asset forfeiture (05)
[ ] Petition re: arbitration award (11)
[ ] Writ of mandate (02)
[ ] Other judicial review (39)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403)
[ ] Antitrust/Trade regulation (03)
[ ] Construction defect (10)
[ ] Mass tort (40)
[ ] Securities litigation (28)
[ ] Environmental/Toxic tort (30)
[ ] Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment
[ ] Enforcement of judgment (20)

Miscellaneous Civil Complaint
[ ] RICO (27)
[ ] Other complaint *(not specified above)* (42)

Miscellaneous Civil Petition
[ ] Partnership and corporate governance (21)
[ ] Other petition *(not specified above)* (43)

2. This case [ ] is [x] is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
   a. [ ] Large number of separately represented parties
   b. [ ] Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
   c. [ ] Substantial amount of documentary evidence
   d. [ ] Large number of witnesses
   e. [ ] Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
   f. [ ] Substantial postjudgment judicial supervision
3. Remedies sought *(check all that apply):* a. [x] monetary b. [ ] nonmonetary; declaratory or injunctive relief c. [x] punitive
4. Number of causes of action *(specify):* 4
5. This case [ ] is [x] is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. *(You may use form CM-015.)*

Date: September 4, 2024
Dana Barbeau
(TYPE OR PRINT NAME)

DocuSigned by:
Dana Barbeau
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)
FEBA3BADD25344E...

NOTICE
- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Form Adopted for Mandatory Use
Judicial Council of California
CM-010 [Rev. January 1, 2024]

CIVIL CASE COVER SHEET

Cal. Rules of Court, rules 2.30, 3.220, 3.400–3.403, 3.740;
Cal. Standards of Judicial Administration, std. 3.10
www.courts.ca.gov

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than $25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort
- Auto (22)–Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) *(if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)*

Other PI/PD/WD (Personal Injury/ Property Damage/Wrongful Death) Tort
- Asbestos (04)
  - Asbestos Property Damage
  - Asbestos Personal Injury/ Wrongful Death
- Product Liability *(not asbestos or toxic/environmental)* (24)
- Medical Malpractice (45)
  - Medical Malpractice–Physicians & Surgeons
- Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
  - Premises Liability (e.g., slip and fall)
  - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
  - Intentional Infliction of Emotional Distress
  - Negligent Infliction of Emotional Distress
  - Other PI/PD/WD

Non-PI/PD/WD (Other) Tort
- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) *(not civil harassment)* (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
  - Legal Malpractice
  - Other Professional Malpractice *(not medical or legal)*
- Other Non-PI/PD/WD Tort (35)

Employment
- Wrongful Termination (36)
- Other Employment (15)

Contract
- Breach of Contract/Warranty (06)
  - Breach of Rental/Lease Contract *(not unlawful detainer or wrongful eviction)*
  - Contract/Warranty Breach–Seller Plaintiff *(not fraud or negligence)*
  - Negligent Breach of Contract/ Warranty
  - Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
  - Collection Case–Seller Plaintiff
  - Other Promissory Note/Collections Case
- Insurance Coverage *(not provisionally complex)* (18)
  - Auto Subrogation
  - Other Coverage
- Other Contract (37)
  - Contractual Fraud
  - Other Contract Dispute

Real Property
- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
  - Writ of Possession of Real Property
  - Mortgage Foreclosure
  - Quiet Title
  - Other Real Property *(not eminent domain, landlord/tenant, or foreclosure)*

Unlawful Detainer
- Commercial (31)
- Residential (32)
- Drugs (38) *(if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)*

Judicial Review
- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
  - Writ–Administrative Mandamus
  - Writ–Mandamus on Limited Court Case Matter
  - Writ–Other Limited Court Case Review
- Other Judicial Review (39)
  - Review of Health Officer Order
  - Notice of Appeal–Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)
- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims *(arising from provisionally complex case type listed above)* (41)

Enforcement of Judgment
- Enforcement of Judgment (20)
  - Abstract of Judgment (Out of County)
- Confession of Judgment *(non-domestic relations)*
- Sister State Judgment
- Administrative Agency Award *(not unpaid taxes)*
- Petition/Certification of Entry of Judgment on Unpaid Taxes
- Other Enforcement of Judgment Case

Miscellaneous Civil Complaint
- RICO (27)
- Other Complaint *(not specified above)* (42)
  - Declaratory Relief Only
  - Injunctive Relief Only *(non-harassment)*
  - Mechanics Lien
  - Other Commercial Complaint Case *(non-tort/non-complex)*
  - Other Civil Complaint *(non-tort/non-complex)*

Miscellaneous Civil Petition
- Partnership and Corporate Governance (21)
- Other Petition *(not specified above)* (43)
  - Civil Harassment
  - Workplace Violence
  - Elder/Dependent Adult Abuse
  - Election Contest
  - Petition for Name Change
  - Petition for Relief From Late Claim
  - Other Civil Petition

For your protection and privacy, please press the Clear This Form button after you have printed the form.

Print this form Save this form Clear this form

24CV446657
Santa Clara – Civil

CM-110 R Fleming

ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER:
NAME: Philip I. Person (SBN 281496) Tayanah C. Miller (SBN 299123)
FIRM NAME: Khushpreet K. Choumwer (SBN 355576)
STREET ADDRESS: Greenberg Traurig LLP 101 Second Street, Suite 2200
CITY: San Francisco STATE: CA ZIP CODE: 94105
TELEPHONE NO.: 415.655.1300 FAX NO.: 415.707.2010
EMAIL ADDRESS: personp@gtlaw.com; millerta@gtlaw.com; khushpreet.choumwer@gtlaw.cc
ATTORNEY FOR *(name)*: Defendant Intuit Inc.

FOR COURT USE ONLY

Electronically Filed by Superior Court of CA, County of Santa Clara, on 3/27/2025 5:12 PM Reviewed By: R. Fleming Case #24CV446657 Envelope: 18768470

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
STREET ADDRESS: 191 North First Street,
MAILING ADDRESS:
CITY AND ZIP CODE: San Jose, CA 95113
BRANCH NAME: Downtown

PLAINTIFF/PETITIONER: John Yoon
DEFENDANT/RESPONDENT: Intuit Inc.

CASE MANAGEMENT STATEMENT

(Check one): ☐ **UNLIMITED CASE** (Amount demanded exceeds $35,000) ☐ **LIMITED CASE** (Amount demanded is $35,000 or less)

CASE NUMBER: 24CV446657

A **CASE MANAGEMENT CONFERENCE** is scheduled as follows:

Date: April 11, 2025 Time: 10:01AM Dept.: 16 Div.: Room:

Address of court *(if different from the address above):*

☒ **Notice of Intent to Appear by Telephone, by *(name):*** Philip I. Person

INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.

1. **Party or parties** *(answer one):*
   a. ☒ This statement is submitted by party *(name):* INTUIT INC.
   b. ☐ This statement is submitted **jointly** by parties *(names):*
2. **Complaint and cross-complaint** *(to be answered by plaintiffs and cross-complainants only)*
   a. The complaint was filed on *(date):*
   b. ☐ The cross-complaint, if any, was filed on *(date):*
3. **Service** *(to be answered by plaintiffs and cross-complainants only)*
   a. ☐ All parties named in the complaint and cross-complaint have been served, have appeared, or have been dismissed.
   b. ☐ The following parties named in the complaint or cross-complaint
      (1) ☐ have not been served *(specify names and explain why not):*
      (2) ☐ have been served but have not appeared and have not been dismissed *(specify names):*
      (3) ☐ have had a default entered against them *(specify names):*
   c. ☐ The following additional parties may be added *(specify names, nature of involvement in case, and date by which they may be served):*
4. **Description of case**
   a. Type of case in ☒ complaint ☐ cross-complaint *(Describe, including causes of action):*
   This is a single-plaintiff case alleging the following four causes of action against the Defendant: (1) disability discrimination; (2) failure to accommodate; (3) retaliation for taking FMLA leave; and (4) wrongful termination in violation of public policy.

PLAINTIFF/PETITIONER: John Yoon DEFENDANT/RESPONDENT: Intuit Inc.	CASE NUMBER: 24CV446657

4. b. Provide a brief statement of the case, including any damages *(if personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings; if equitable relief is sought, describe the nature of the relief):*
Plaintiff alleges he suffered disability discrimination and retaliation. Defendant disputes these allegations.

☐ *(If more space is needed, check this box and attach a page designated as Attachment 4b.)*

5. **Jury or nonjury trial**
The party or parties request ☐ a jury trial ☒ a nonjury trial. *(If more than one party, provide the name of each party requesting a jury trial):*

6. **Trial date**
a. ☐ The trial has been set for *(date):*
b. ☒ No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint *(if not, explain):*

c. Dates on which parties or attorneys will not be available for trial *(specify dates and explain reasons for unavailability):*
Lead counsel for Defendant is unavailable from December 15, 2025, through December 26, 2025.

7. **Estimated length of trial**
The party or parties estimate that the trial will take *(check one)*
a. ☒ days *(specify number):* 7
b. ☐ hours (short causes) *(specify):*

8. **Trial representation** *(to be answered for each party)*
The party or parties will be represented at trial ☒ by the attorney or party listed in the caption ☐ by the following:
a. Attorney:
b. Firm:
c. Address:
d. Telephone number:
e. Email address:
f. Fax number:
g. Party represented:
☐ Additional representation is described in Attachment 8.

9. **Preference**
☐ This case is entitled to preference *(specify code section):*

10. **Alternative dispute resolution (ADR)**
a. **ADR information package.** Please note that different ADR processes are available in different courts and communities; read the ADR information package provided by the court under rule 3.221 of the California Rules of Court for information about the processes available through the court and community programs in this case.
(1) For parties represented by counsel: Counsel ☒ has ☐ has not provided the ADR information package identified in rule 3.221 to the client and reviewed ADR options with the client.
(2) For self-represented parties: Party ☐ has ☐ has not reviewed the ADR information package identified in rule 3.221.
b. **Referral to judicial arbitration or civil action mediation** (if available).
(1) ☐ This matter is subject to mandatory judicial arbitration under Code of Civil Procedure section 1141.11 or to civil action mediation under Code of Civil Procedure section 1775.3 because the amount in controversy does not exceed the statutory limit.
(2) ☐ Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.
(3) ☐ This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court or from civil action mediation under Code of Civil Procedure section 1775 et seq. *(specify exemption):*

PLAINTIFF/PETITIONER: John Yoon DEFENDANT/RESPONDENT: Intuit Inc.	CASE NUMBER: 24CV446657

10. c. In the table below, indicate the ADR process or processes that the party or parties are willing to participate in, have agreed to participate in, or have already participated in *(check all that apply and provide the specified information):*

	The party or parties completing this form **are willing** to participate in the following ADR processes *(check all that apply):*	If the party or parties completing this form in the case **have agreed** to participate in or have already completed an ADR process or processes, indicate the status of the processes *(attach a copy of the parties' ADR stipulation):*
(1) Mediation	☐	☐ Mediation session not yet scheduled ☐ Mediation session scheduled for (*date*): ☐ Agreed to complete mediation by (*date*): ☐ Mediation completed on (*date*):
(2) Settlement conference	☐	☐ Settlement conference not yet scheduled ☐ Settlement conference scheduled for (*date*): ☐ Agreed to complete settlement conference by (*date*): ☐ Settlement conference completed on (*date*):
(3) Neutral evaluation	☐	☐ Neutral evaluation not yet scheduled ☐ Neutral evaluation scheduled for (*date*): ☐ Agreed to complete neutral evaluation by (*date*): ☐ Neutral evaluation completed on (*date*):
(4) Nonbinding judicial arbitration	☐	☐ Judicial arbitration not yet scheduled ☐ Judicial arbitration scheduled for (*date*): ☐ Agreed to complete judicial arbitration by (*date*): ☐ Judicial arbitration completed on (*date*):
(5) Binding private arbitration	☐	☐ Private arbitration not yet scheduled ☐ Private arbitration scheduled for (*date*): ☐ Agreed to complete private arbitration by (*date*): ☐ Private arbitration completed on (*date*):
(6) Other (*specify*):	☐	☐ ADR session not yet scheduled ☐ ADR session scheduled for (*date*): ☐ Agreed to complete ADR session by (*date*): ☐ ADR completed on (*date*):

PLAINTIFF/PETITIONER: John Yoon DEFENDANT/RESPONDENT: Intuit Inc.	CASE NUMBER: 24CV446657

11. **Insurance**

a. ☐ Insurance carrier, if any, for party filing this statement *(name):*

b. Reservation of rights: ☐ Yes ☐ No

c. ☐ Coverage issues will significantly affect resolution of this case *(explain):*

12. **Jurisdiction**

Indicate any matters that may affect the court's jurisdiction or processing of this case and describe the status.

☐ Bankruptcy ☐ Other *(specify):*

Status:

13. **Related cases, consolidation, and coordination**

a. ☐ There are companion, underlying, or related cases.

(1) Name of case:

(2) Name of court:

(3) Case number:

(4) Status:

☐ Additional cases are described in Attachment 13a.

b. ☐ A motion to ☐ consolidate ☐ coordinate will be filed by *(name party):*

14. **Bifurcation**

☐ The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action *(specify moving party, type of motion, and reasons):*

15. **Other motions**

☐ The party or parties expect to file the following motions before trial *(specify moving party, type of motion, and issues):*

16. **Discovery**

a. ☐ The party or parties have completed all discovery.

b. ☒ The following discovery will be completed by the date specified *(describe all anticipated discovery):*

Party	Description	Date
Defendant	Written Discovery	Per Code
Defendant	Deposition(s)	Per Code

c. ☐ The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated *(specify):*

PLAINTIFF/PETITIONER: John Yoon DEFENDANT/RESPONDENT: Intuit Inc.	CASE NUMBER: 24CV446657

17. **Economic litigation**

a. ☐ This is a limited civil case (i.e., the amount demanded is $35,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90-98 will apply to this case.

b. ☐ This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed *(if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case):*

18. **Other issues**

☐ The party or parties request that the following additional matters be considered or determined at the case management conference *(specify):*

19. **Meet and confer**

a. ☒ The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court *(if not, explain):*

b. ☐ After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following *(specify):*

20. Total number of pages attached *(if any):* _____

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and alternative dispute resolution, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date: March 26, 2025

Philip I. Person
(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY)

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY)

☐ Additional signatures are attached.

PROOF OF SERVICE

I am a citizen of the United States, over the age of 18 years, and not a party to or interested in this action. I am employed in the County of San Francisco, State of California and my business address is Greenberg Traurig, LLP, 101 Second Street, Suite 2200, San Francisco, CA 95814.

On this day, I caused to be served the following document(s):

DEFENDANT INTUIT INC.'S CASE MANAGEMENT STATEMENT

Parth N. Shah
Andrew Doriott
DORIOTT, POSTAJIAN & SHAH, PC 1310 Westwood Blvd.
Los Angeles, CA 90069
pshah@dpslawpc.com
adoriott@dpslawpc.com

☒ **(BY EMAIL)**

I caused a true copy of the foregoing document to be served by e-mail from michelle.viera@gtlaw.com to the e-mail addresses set forth above. Each email was complete and no reports of error were received.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 27, 2025 at San Francisco, California.

Michelle Viera